

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CHRISTOPHER E. BROWN,
an individual,

Plaintiff,

vs.

CLAIR-BEN CORP.,
a New York Corporation,

Defendant.
-----X

Case No.: 1:22-cv-06709-NRM-JRC

**JOINT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF’S COMPLAINT**

COMES NOW, Christopher E. Brown, Plaintiff and Defendant, Clair-Ben Corp. in the above-styled civil action, by and through their undersigned counsel of record, and file this Joint Motion for Extension of Time for Defendant Clair-Ben Corp. (“Defendant”) to Respond to Plaintiff’s Complaint. Plaintiff and Defendant, respectfully request that the Court extend the time for Defendant to answer or otherwise respond to Plaintiff’s Complaint by thirty (30) days. In support thereof, Plaintiff shows the Court as follows:

1. Plaintiff filed his operative Complaint on November 03, 2022. [Doc. 1].
2. Defendant was served with a copy of Plaintiff’s Complaint on November 30, 2022.

[Doc.7].

3. Consequently, Defendant’s response to Plaintiff’s Complaint is currently due by December 21, 2022.

4. However, the parties are currently working toward a potential resolution of the case and would like the opportunity to do so without Defendant incurring the time or expense required for it to prepare and file defensive pleadings.

5. There have been no previous requests for an extension to respond in this case.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court grant the foregoing motion and provide Defendant with an extension of time up to and including January 20, 2023, to answer or otherwise respond to Plaintiff's Complaint.

Date: December 16, 2022

Respectfully submitted,

/s/ Louis I. Mussman
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Respectfully submitted,

/s/ Steven Chase
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of December, 2022, I electronically filed the foregoing with the Clerk of Court by using CM/ECF system and a true and correct copy will be mailed to the following:

Steven Chase, Esq.
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By: Louis I. Mussman
Louis I. Mussman, Esq.